

ELLIS:LAWHORNE

John J. Pringle, Jr.
Direct dial: 803/343-1270
jpringle@ellislawhorne.com

November 10, 2004

South Carolina Public Service Commission

ATTN: Docketing Department

PO Drawer 11649
Columbia SC 29211

RE: Payphone Service Provider (PSP) Application of Symtelco, LLC
Our File No. 910-10257

To Whom It May Concern:

2004-334-C

Enclosed is the original and ten (10) copies of the payphone service provider ("PSP") **Application** filed on behalf of Symtelco, LLC ("Symtelco") in the above-referenced matter.

Symtelco is proposing to offer, among other local exchange and interexchange telecommunications services, collect-only inmate telephone services. Symtelco is seeking that authority from the Commission in Docket No. 2004-265-C.

Accordingly, to the extent that Symtelco offers inmate telephone services as part of any PSP certification granted by the Commission, Symtelco seeks waiver of the application of certain of the Commissions Guidelines for Payphone Service Providers (the "Guidelines") to Symtelco's inmate telephone services. Symtelco requests a waiver of all the "Information and Posting Requirements" (Guidelines 1-13) and certain of the "Connection, Setup, Rates and Operation" Guidelines, particularly Guideline Nos. 13-17, 19, and 20.

The enumerated guidelines are either wholly inapplicable to inmate service providers and the confinement facility services they provide (Guidelines 1-17), or would hamper Symtelco's ability to offer its services in an efficient manner (Guidelines 19 and 20). Further, Symtelco is informed and believes that the Commission has granted waivers of Guidelines 19 and 20 to other similarly situated inmate service carriers in South Carolina.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope. If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

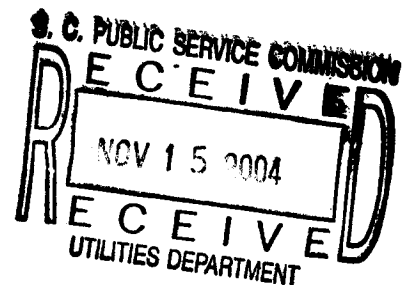
John J. Pringle, Jr.
John J. Pringle, Jr.

JJP/cr

cc: Mr. Greg Hogan

Mr. Craig Neeld

Enclosures



~~1719-74 OMS~~

OFFICE USE ONLY:
CERTIFICATION NUMBER: _____

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

PAYPHONE SERVICE PROVIDER (PSP)
APPLICATION FOR CERTIFICATION

~~20150~~

SECTION I: APPLICANT INFORMATION

Symtelco, LLC

NAME IN WHICH CERTIFICATION TO BE ISSUED



SOCIAL SECURITY *or* FEDERAL EMPLOYEE IDENTIFICATION NUMBER

1385 Weber Industrial Drive

MAILING ADDRESS

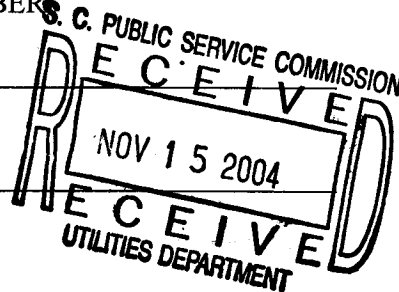
Cumming, Georgia 30041

CITY, STATE, ZIP

Greg Hogan, President

678-455-2770

CONTACT PERSON *or* RESPONSIBLE PARTY'S NAME, TITLE & PHONE NUMBER



SECTION II: ORGANIZATION

Type of Organization (please check):

Individual ----- []
Partnership ----- []
Corporation ----- [X]
Other (please specify) _____

If a Corporation:

Attach Articles of Incorporation and,

If *nonresident corporation*, attach copy of Certification of Good Standing issued by the South Carolina Secretary of State's office which indicates corporation's authority to do business in South Carolina.

SECTION III: FINANCIAL

Provide a statement, which describes the general financial status of the applicant (current assets, liabilities, etc.) **Attach to application.**

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

PAYPHONE SERVICE PROVIDER (PSP)
APPLICATION FOR CERTIFICATION (Page 2)

SECTION IV: MAINTAINANCE & SERVICE

How does applicant intend to provide routine maintenance and service?

Personally ----- ☐
Employee(s) ----- ☐
Via contract (Interstate Telecommunications, Inc.) ----- ☒

How does applicant intend to accommodate end user service needs (repairs, refunds, customer inquiries, etc.)?

Personally ----- ☒
Employee(s) ----- ☐
Via contract (Who? – Provide details on separate sheet) ----- ☐

SECTION V: AGREEMENT

Greg Hogan, President

RESPONSIBLE PARTY & TITLE (please type or print)

1385 Weber Industrial Drive, Bumming, Georgia 30041
ADDRESS


APPLICANT UNDERSTANDS THAT THE FILING OF THIS APPLICATION DOES NOT CONSTITUTE AUTHORITY TO OPERATE. APPLICANT AGREES TO INFORM THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA OF ANY CHANGES IN THE ABOVE PROVIDED INFORMATION WITHIN 30 DAYS; AND FILE ANNUAL REPORT INFORMATION AS REQUIRED. THE APPLICANT ALSO AGREES TO REVIEW AND ADHERE TO ALL GUIDELINES SET FORTH BY THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA FOR PAYPHONE SERVICE PROVIDERS.



Greg Hogan, President

SUBSCRIBED AND SWORN BEFORE ME

THIS 5th DAY OF November 2004


(NOTARY PUBLIC)



Iris Diana Mennens
My Commission DD217158
Expires May 29, 2007

(SEAL)

RETURN TO
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
POST OFFICE DRAWER 11649
COLUMBIA SC 29211

Symtelco, Inc.

Attachment I

Articles of Incorporation

ARTICLES OF ORGANIZATION
OF
CONCENTRIC COMMUNICATIONS, LLC

I.

The name of the Limited Liability Company is:

Concentric Communications, LLC

II.

The latest date upon which the Limited Liability Company may dissolve is December 31, 2052.

III.

The name and address of each organizer of the Limited Liability Company is:

<u>Name</u>	<u>Address</u>
Michael E. Jacobs	11625 Rainwater Drive, Suite 350 Alpharetta, Georgia 30004

IV.

The street address and county of the Limited Liability Company's initial registered office is 1385 Weber Industrial Drive, Forsyth County, Cumming, Georgia 30041, and its initial registered agent at that office is Frank Zimmerer.

V.

The mailing address of the Limited Liability Company's principal place of business is 1385 Weber Industrial Drive, Cumming, Georgia 30041.

IN WITNESS WHEREOF, the undersigned has executed these Articles of Organization this 5th day of September, 2002.

/s/ Michael E. Jacobs

Michael E. Jacobs
Organizer

SECRETARY OF STATE

2002 SEP -6 A 10:46

CORPORATIONS DIVISION

**WRITTEN CONSENT OF THE MEMBERS
OF
CONCENTRIC COMMUNICATIONS, LLC
IN LIEU OF SPECIAL MEETING**


The undersigned, being all of the members of Concentric Communications, LLC (the "Company"), pursuant to Section 14-11-309 and 14-11-310 of the Georgia Limited Liability Company Act (the "Act"), as amended, do hereby consent to the adoption of, and do hereby confirm, approve, adopt and ratify the following actions:

1. The Articles of Organization of the Company as filed with the Secretary of State of Georgia on September 6, 2002, shall be amended to change the name of the Company to "SYMTELCO, LLC."

2. The Members furthermore hereby authorize Gregory Hogan to execute Articles of Amendment giving effect to the aforesaid name change on behalf of the Company and to cause such Articles to be filed with the Secretary of State.

Dated as of the 17th day of October, 2002.

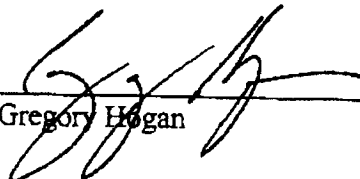
MEMBERS:



Frank Zimmerer



Sandra Clay



Gregory Hogan

**ARTICLES OF AMENDMENT
OF
CONCENTRIC COMMUNICATIONS, LLC**

Pursuant to O.C.G.A. § 14-11-210 of the Georgia Business Corporation Code, CONCENTRIC COMMUNICATIONS, LLC, a Georgia limited liability company, hereby submits the following Articles of Amendment:

I.

The name of the limited liability company is CONCENTRIC COMMUNICATIONS, LLC and the charter number of the limited liability company is 0245420. Its Articles of Organization were filed on September 6, 2002.

II.

Article One of the Articles of Organization is hereby amended to read as follows:

"The name of the Limited Liability Company is: "SYMTELCO, LLC"

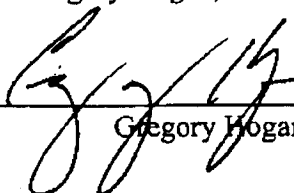
III.

The foregoing Amendment was duly unanimously adopted by the members of the Limited Liability Company as of October 17, 2002, and the undersigned member was thereby authorized to execute these Articles of Amendment.

IN WITNESS WHEREOF, CONCENTRIC COMMUNICATIONS, LLC, has caused these Articles of Amendment to be executed by its duly authorized members on this 17th day of October, 2002.

CONCENTRIC COMMUNICATIONS, LLC

Gregory Hogan, Member



Gregory Hogan (SEAL)

Symtelco, Inc.

Attachment II

So Carolina Secretary of State Certificate

JUN 03 2004

STATE OF SOUTH CAROLINA
SECRETARY OF STATE

FILED

JUN 03 2004

Mark Hammond
SECRETARY OF STATE OF SOUTH CAROLINA

APPLICATION FOR A CERTIFICATE OF AUTHORITY
BY A FOREIGN LIMITED LIABILITY COMPANY
TO TRANSACT BUSINESS IN SOUTH CAROLINA

Mark Hammond
SECRETARY OF STATE 4

TYPE OR PRINT CLEARLY WITH BLACK INK

The following Foreign Limited Liability Company applies for a Certificate of Authority to Transact Business in South Carolina in accordance with Section 33-44-1002 of the 1976 South Carolina Code of Laws, as amended.

1. The name of the foreign limited liability which complies with Section 33-44-1005 of the 1976 South Carolina Code as amended is Symtelco, LLC

2. The name of the State or Country under whose law the company is organized is Georgia

3. The street address of the Limited Liability Company's principal office is
1385 Weber Industrial Drive
Street Address
Cumming Georgia 30041
City State Zip Code

4. The address of the Limited Liability Company's current designated office in South Carolina is
75 Beattie Place
Street Address
Greenville South Carolina 29601
City State Zip Code

5. The street address of the Limited Liability Company's initial agent for service of process in South Carolina is
c/o C T Corporation System, 75 Beattie Place
Street Address
Greenville South Carolina 29601
City State Zip Code

and the name of the Limited Liability Company's agent for service of process at the address is
C T Corporation System

Name By: Signature

6. ☐ Check this box if the duration of the company is for a specified term, and if so, the period specified _____

Symtelco, LLC

Name of Limited Liability Company

7. ☐ Check this box if the company is manager-managed. If so, list the names and business addresses of each manager

a. _____
Name

Business Address

City State Zip Code

b. _____
Name

Business Address

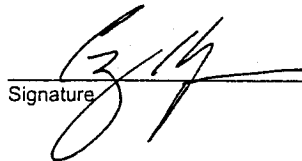
City State Zip Code

8. ☒ Check this box if one or more members of the foreign limited liability company are to be liable for the company's debt and obligation under a provision similar to Section 33-44-303(c) of the 1976 South Carolina Code of Laws, as amended.

Date

5/26/2004

Signature



Greg Hogan Managing Member

Name

Capacity

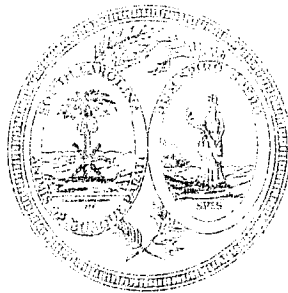
FILING INSTRUCTIONS

1. This application must be accompanied by an original certificate of existence not more than 30 days old (or a record of similar import) authenticated by the Secretary of State or other official having custody of the Limited Liability Company records in the state or country under which it is organized.
2. File two copies of these articles, the original and either a duplicate original or a conformed copy.
3. If management of a limited liability company is vested in managers, a manager shall execute this form. If management of a limited liability company is reserved to the members, a member shall execute this form. Specify whether a member or manager is executing this form.
4. This form must be accompanied by the filing fee of \$110.00 payable to the Secretary of State.

Return to: Secretary of State
P.O. Box 11350
Columbia, SC 29211

5. The first annual report for limited liability company must be delivered to the Secretary of State between January first and April first of the calendar year after which the limited liability company was organized or the foreign company was first authorized to transact business in South Carolina. Subsequent annual reports must be delivered to the Secretary of State on or before the fifteenth day of the fourth month following the close of the limited liability company's taxable year.

The State of South Carolina



Office of Secretary of State Mark Hammond **Certificate of Authorization**

I, Mark Hammond, Secretary of State of South Carolina Hereby certify that:

SYMTELCO, LLC, A Limited Liability Company duly organized under the laws of the State of GEORGIA, and issued a certificate of authority to transact business in South Carolina on June 3rd, 2004, with a duration that is at will, has as of this date filed all reports due this office, including its most recent annual report as required by section 33-44-211, paid all fees, taxes and penalties owed to the Secretary of State, that the Secretary of State has not mailed notice to the company that it is subject to being dissolved by administrative action pursuant to section 33-44-809 of the South Carolina Code, and that the company has not filed a certificate of cancellation as of the date hereof.

Given under my Hand and the Great Seal of
the State of South Carolina this 3rd day of
June, 2004.

A handwritten signature in black ink that reads "Mark Hammond".

Mark Hammond, Secretary of State

Symtelco, LLC
INCOME STATEMENT
For the One Month and Six Months Ended June 30, 2004

	Current Period		Year to Date	
	Amount	Percent	Amount	Percent
Gross Fees				
Gross Fees - Line Charges	\$ 105,941.24	77.43	\$ 601,689.83	79.88
Gross Fees - Carrier Access				
Billing	30,874.00	22.57	111,784.23	14.84
Gross Fees - Other	<u>0.00</u>	<u>0.00</u>	<u>39,751.00</u>	<u>5.28</u>
Total Gross Fees	<u>136,815.24</u>	<u>100.00</u>	<u>753,225.06</u>	<u>100.00</u>
Direct Expenses				
Supplies - Direct	0.00	0.00	395.56	0.05
Travel - Direct	0.00	0.00	2,093.09	0.28
Outside Services - Direct	4,925.00	3.60	16,694.84	2.22
Telephone Line Charges	<u>87,132.23</u>	<u>63.69</u>	<u>370,662.73</u>	<u>49.21</u>
Total Direct Expenses	<u>92,057.23</u>	<u>67.29</u>	<u>389,846.22</u>	<u>51.76</u>
Gross Profit	<u>44,758.01</u>	<u>32.71</u>	<u>363,378.84</u>	<u>48.24</u>
Indirect Expenses				
Manager Salaries	3,807.00	2.78	23,284.80	3.09
Insurance Liability	0.00	0.00	2,845.00	0.38
Insurance Health	120.76	0.09	724.56	0.10
Office Supplies	124.95	0.09	124.95	0.02
Stationary and Forms	0.00	0.00	179.25	0.02
Telephone	292.59	0.21	1,308.28	0.17
Depreciation	507.71	0.37	2,180.58	0.29
Amortization of Org Cost	48.42	0.04	242.10	0.03
Amortization of Start Up Expenses	458.59	0.34	2,292.95	0.30
Accounting Services	407.60	0.30	3,903.10	0.52
Legal Services	1,449.66	1.06	10,018.99	1.33
Dues & Subscriptions	250.00	0.18	800.00	0.11
Bank Charges	0.00	0.00	250.00	0.03
Taxes and Licenses	4,746.99	3.47	31,007.98	4.12
Payroll Taxes	291.24	0.21	1,893.06	0.25
Other Expenses	0.00	0.00	89.14	0.01
Interest Income	0.00	0.00	(1,702.50)	(0.23)
Total Indirect Expenses	<u>12,505.51</u>	<u>9.14</u>	<u>79,442.24</u>	<u>10.55</u>
Net Income (Loss)	<u>\$ 32,252.50</u>	<u>23.57</u>	<u>\$ 283,936.60</u>	<u>37.70</u>

Symtelco, Inc.

Attachment III

Financial Information

Symtelco, LLC
BALANCE SHEET
June 30, 2004

Assets

Current Assets

Cash - Operations - BNG	\$322,367.58
Accts Receivable - Billed	<u>4,630.06</u>
Total Current Assets	<u>326,997.64</u>

Property & Equipment

Equipment & Apparatus	2,365.70
Autos, Trucks & Trailers	25,970.12
Furniture & Fixtures	2,126.25
Accumulated Depreciation	<u>(2,645.29)</u>
Total Property & Equipment	<u>27,816.78</u>

Other Assets

Organization Cost	2,905.41
Acc Amort - Org Cost	(823.15)
Start up Expenses	27,515.49
Acc Amort - Start Up Expenses	(7,796.03)
Deposits - Other	<u>109,500.00</u>
Total Other Assets	<u>131,301.72</u>
Total Assets	<u><u>\$ 486,116.14</u></u>

Symtelco, LLC
BALANCE SHEET
June 30, 2004

Liabilities and Members Equity

Current Liabilities

Loan	\$ 119,896.09
Accrued Payroll	<u>1,142.10</u>
Total Current Liabilities	<u>121,038.19</u>
Total Liabilities	<u>121,038.19</u>

Members' Equity

Capital	126,141.35
Drawing	(45,000.00)
Net Income (Loss)	<u>283,936.60</u>
Total Members' Equity	<u>365,077.95</u>
Total Liabilities and Members' Equity	<u><u>\$ 486,116.14</u></u>